



James B. Wright
Senior Attorney

14111 Capital Boulevard
Wake Forest, NC 27587-5900
Mailstop NCWKFR0313
Voice 919 554 7587
Fax 919 554 7913
james.b.wright@mail.sprint.com

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OFFICE OF THE
EXECUTIVE SECRETARY

September 27, 2001

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

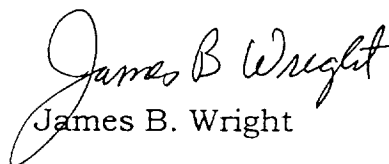
Re: Docket No. 97-00409: *All Telephone Companies Tariff Filings
Regarding Reclassification of Pay Telephone Service.*
UTSE Response to Motion to Compel

Dear Mr. Waddell:

Enclosed for filing are an original and thirteen copies of the Response of United Telephone-Southeast, Inc. to the September 20, 2001 Order Granting Motion to Compel. Copies are being served on counsel of record.

Please contact me if you have any questions.

Sincerely,


James B. Wright

cc: Parties of Record (with enclosure)
Laura Sykora
Kaye Odum
Whitney Malone

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that on September 27, 2001 the Reponse of United Telephone-Southeast, Inc. to the Order Granting Motion to Compel was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

Henry Walker
Boult, Cummings
414 Union Street, Suite 1600
Nashville, TN 37219

Ted G. Pappas
Bass, Berry & Simms
2700 First American Center
Nashville, TN 37238

Consumer Advocate and
Protection Division
425 Fifth Avenue North, 2nd Fl.
Nashville, TN 37243

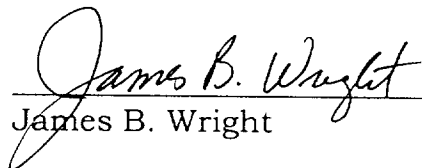
Guilford R. Thornton, Jr. Esq.
Stokes & Bartholomew
424 Church St, Suite 2800
Nashville, TN 37219-2386

Guy M. Hicks
BellSouth Telecommunications
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

James P. Lamoureux
AT&T Communications
1200 Peachtree Street, Suite 8100
Atlanta, Georgia 30309

John Adams
Citizens Telecom
1400 16th St., NW, #500
Washington, DC 20036

Jon E. Hastings
Boult, Cummings, Conner & Berry
414 Union Street, Suite 1600
Nashville, TN 37219-1777


James B. Wright

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: All Telephone Companies Tariff Filings Regarding Reclassification of Pay
Telephone Service as Required by FCC Docket No. 96-128

Docket No. 97-00409

RESPONSE OF UNITED TELEPHONE – SOUTHEAST, INC. TO ORDER
GRANTING MOTION TO COMPEL

In response to the Tennessee Payphone Association's ("TPOA") September 10, 2001 Motion to Compel United Telephone-Southeast, Inc. to Respond to Discovery, the Tennessee Regulatory Authority ("TRA") issued an Order Granting Motion to Compel on September 20, 2001. The TRA's order requires United Telephone-Southeast, Inc. ("Sprint") to further answer request numbers 11(a), 11(b) and 18(c) from the TPOA's June 22, 2001 First Set of Data Requests and/or "explain why the information is not available" by September 27, 2001. In essence, the TPOA's motion seeks information regarding the average length and cost of those local loops Sprint uses to provide payphone service in Tennessee, as opposed to the average length and cost of all voice grade local loops weighted by payphone lines per Sprint wire center.

As a preliminary matter, Sprint believes that it has answered request numbers 11(a) and 11(b) in full. The two requests asked Sprint whether the payphone local loop cost provided in its May 1, 2001 cost study was payphone specific, and if yes, to explain in detail how this was so. Sprint answered that its payphone local loop cost was indeed payphone specific and that it was developed by weighting the average local loop cost for each Sprint wire center by the number of payphone lines in that wire center so as to arrive at a statewide payphone loop cost. While the TPOA may disagree with Sprint's methodology, nothing in Sprint's answer is incomplete or otherwise lacking in candor.

Request number 18(c) asked Sprint to provide the average length of its local loops, by wire center, used to provide payphone service in Tennessee. Sprint's answer simply referred back to its answer for request number 18(a), which provided the average loop length of all Sprint local loops by Tennessee wire center. Sprint did not provide payphone specific local loop lengths because the information was not readily available. The very nature of discovery is that parties are only obligated to produce information that is readily available.

Nevertheless, Sprint has realized that the TPOA's only remaining argument in this docket concerns Sprint's use of average local loop lengths weighted by wire center versus the TPOA's claim that payphone specific loop lengths must be used. While not wishing to establish a precedent or create an expectation regarding future discovery requests, Sprint wishes to advise the TRA that it is nearing completion of a revised cost study that will incorporate payphone specific locations. Sprint's effort to complete this revised study has been substantial and has entailed recording the longitudes and latitudes of every payphone location (both affiliate and independent) within Sprint's Tennessee local service area.

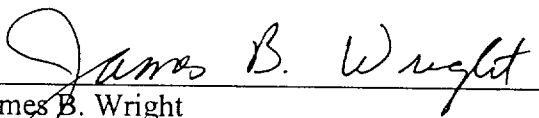
Sprint continues to believe that the methodology used in its currently filed cost study is the most appropriate way to establish payphone rates. The essential nature of payphone service is that payphone providers may establish service from any location within Sprint's network. Even if local loops used for payphone service at the time of the revised study are on average shorter than average voice grade loops, payphones are highly portable and the TPOA cannot promise that the location of payphones will not change over time. The elimination of payphones close to central offices or the relocation

of payphones to locations further away from central offices will cause Sprint to under-recover its costs. Despite these concerns, Sprint is producing the revised cost study in order to assist the TRA in making a more informed decision. Also, Sprint hopes the revised study will expedite an ultimate resolution of this matter and in the end cause all the parties to expend less resources in reaching that resolution.

Sprint expects to have a revised cost study completed by October 10, 2001 which incorporates payphone location information and other current factors. Accordingly, Sprint requests that this explanation for the current unavailability of the information be acted upon by the TRA by extending the September 27, 2001 filing date for the requested information to October 10, 2001. Sprint is currently providing payphone services to the TPOA at the rates already approved for BellSouth, and the TPOA will not be financially harmed by the requested extension.

Respectfully submitted this 27th day of September 2001.

UNITED TELEPHONE-SOUTHEAST, INC.



James B. Wright
Senior Attorney
14111 Capital Boulevard
Wake Forest, North Carolina 27587
Tel. 919-554-7587